

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to  
Defendant Al Rajhi Banking and Investment Corporation**

Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

1. Al Rajhi Banking & Investment Corporation ("Al Rajhi") is part of a network of banks, corporations, wealthy individuals, and so-called "charities" that have aided, abetted, funded, and provided material support to al Qaeda and Osama bin Laden. Without this crucial support, the al Qaeda terrorists could not have planned and carried out their attacks.
2. Acts of terrorism, such as the September 11, 2001 attacks on the United States – and the financing or material support of them – committed by private parties such as Al Rajhi Bank are actionable and give rise to Al Rajhi Bank's liability [under the ATCA].
3. Al Rajhi Bank has served as one of al Qaeda's preferred banks for many years, maintaining accounts for many of the charitable organization defendants that operate within al Qaeda's infrastructure, including but not limited to the International Islamic Relief Organization ("IIRO"), the Muslim World League ("MWL"), the World Association of Muslim Youth ("WAMY"), Benevolent International Foundation ("BIF") and Al Haramain Islamic Foundation ("Al Haramian").
4. The IIRO has accounts in Al Rajhi Bank, where donors deposit their donations. One of the IIRO Bank Account Numbers at Al Rahji Bank is 77700. The IIRO places advertisements for donations in their own publications, and Al Rajhi Bank collects and deposits these charitable donations into joint accounts according to the account numbers.
5. The IIRO is one of the chief Saudi charities definitively linked to financing a variety of international terrorist groups.
6. Al Rajhi Bank assisted the terrorist group al Qaeda knowing that the assistance would lead to wrongful and harmful acts. Specifically, Al-Rajhi Bank collected so-called "charitable" donations on behalf of Sanabil Al Kheer (Translation: "Seeds of Charity"), the financial/investment arm of the IIRO, depositing the donations into Sanabil's Al Rajhi Bank account no. 77707. Sanabel Al-Kheer, which the IIRO "owns or controls," was established as a separate branch of the IIRO in 1987 to make investments designed to support the IIRO's charitable operations. Al Rajhi Bank collects Sanabel's donations, while organizations like Sanabel/IIRO and the Jeddah Al-Birr Society ensure their donors a reward of religious fulfillment.

7. Under the guise of IIRO funds labeled and designated for purposes such as “war and disaster” (Account number for Immigrants, Refugees, and Victims of Disasters: 77702) or “sponsor a child” (IIRO Account Number of Deprived Children: 77704) charitable organizations such as the IIRO use banks like Al Rajhi Bank to gather donations that fund terrorism and terrorist activities.
8. Al Rajhi Bank also handled IIRO “charitable” contributions intended to benefit suicide bombers by directing Al Igatha Journal advertisements toward humanitarian needs in Somalia, Sri Lanka, India, and the Philippines under IIRO Account number 77709 for “the action most loved by Allah.”
9. Al Rajhi Bank aided and abetted al Qaeda as the handler of donations for the donee, the IIRO, because Al Rajhi Bank knew about their terrorist organization’s illegal operations and provided aid to al Qaeda with the intent to facilitate those their illegal activities. While serving as the collector of donations for these “charitable” organizations, professing “sublime noble values and deep-rooted traditions,” Al Rajhi Bank’s pattern is also to make direct donations to terrorist organizations.
10. This financial support managed by Al Rajhi Bank, although intended to aid an organization’s peaceful activities, is a de facto mechanism for freeing up resources that can be used for terrorist acts.
11. Al Rajhi Bank knowingly and intentionally supplied the funds to the persons who committed the violent terrorist acts. Money was funneled to the Hamburg, Germany a Qaeda] cell through the Saudi Al Rajhi Bank to businessmen Mahmoud Darkazanli Abdul Fattah Zammar who provided the al Qaeda cell of September 11 hijackers with financial and logistical support.
12. Through Al Rajhi Bank, September 11 hijacker Abdulaziz Al Omari received funds into his Al Rajhi Bank Account Number: 162608010366080, 39800061, and Visa Debit Card No. 4909-8016-2002-5747. Al-Omari frequently utilized a credit card drawn on a Saudi Arabian Bank [al-Rajhi bank] in the planning of the attacks.
13. On September 7, 2001, four days before the 9/11 attacks, Al-Omari received a wire transfer from Al Rajhi Bank, Buraidah Branch, Jeddah, Saudi Arabia on SunTrust bank account 265D-NY-280350.
14. On February 17, 1994, Al Rajhi Banking and Investment Company did a \$533,333 donation for the Saudi High Commission in charge of collecting donations for Bosnia and Somalia.
15. On August 1995, Al Rajhi Banking and Investment Company contributed for \$400,000 to the Saudi High Commission in charge of collecting donations for Bosnia during a 12 hour telethon. The donation has been released by Arabic newspaper Asharq Al-Awsat.

16. Transfers to the Al-Rajhi Bank account of Wa'el Hamza Julaidan (account #314608010016294, Haye Al-Salamah, Jeddah, Saudi Arabia) on December 5, 2000. Wa'el Hamza Julaidan has been publicly described in 1999 as "the logistics chief of Bin-Ladin's organization who has fought on Bin-Ladin's side in Afghanistan". Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV.
17. Al Rajhi Banking & Investment materially supported terrorism of the type that implies the element of knowing or intentional support. The liability that arises out of [this kind of] Al Rajhi Bank's knowing and intentional support extends to all points along the causal chain of terrorism. Al Rajhi Bank therefore aided and abetted acts of international terrorism, namely (including but not limited to) the September 11, 2001 attacks on the United States.
18. Al Rajhi Bank provided material support or resources and aided and abetted al Qaeda terrorists, and they did so knowingly and intentionally resulting in a [the] causal chain of violence.
19. Al Rajhi Bank has aided in the commission of the modern day equivalent of piracy, and Al Rajhi has violated present day international law.
20. Al Rajhi Bank has participated in the operation or management of [the] an "Enterprise" – alternatively defined as al Qaeda, the al Qaeda Movement or Radical Muslim Terrorism.
21. Al Rajhi Bank conspired with al Qaeda to attack the United States. As a conspirator, Al Rajhi Bank not only adopted the goal of furthering or facilitating the criminal endeavor, but intended to engage in conduct in furtherance of the enterprise. This endeavor, when [if] completed, would satisfy all the elements of the substantive criminal offense.
22. Abdullah al Rajhi, the head of Al Rajhi Bank, established a network of ostensible charities, known as the Sulaiman Abdul Aziz al-Rajhi ("SAAR") network, to serve as a complex fundraising and money laundering mechanism for al Qaeda. Abdullah al Rajhi used his authority as head of Al Rajhi Bank and as a Director of IIRO and MWL to facilitate the sponsorship of al Qaeda's operations throughout the world.
23. On January 1996, Sulaiman Al-Rajhi donated personally \$80,000 for the Saudi High Commission in charge of collecting donations for Bosnia.
24. Al Rajhi Bank played a direct and active role in the management and operation of al Qaeda's financial network, and Al Rajhi Bank knowingly conspired to further the objectives of the al Qaeda movement during the years leading up to the September 11<sup>th</sup> attacks.

**U.S. Contacts**

25. Al Rajhi Bank has adequate contacts with United States. Al Rajhi Bank purposely directed their actions at residents of the United States when Al Rajhi Bank financed al Qaeda, whose stated purpose was targeting Americans.
26. September 11 hijacker Abdulaziz Al Omari financial transfers with al-Rajhi Bank (supra) [support the FBI's assertion that] demonstrates that al-Omari used his al-Rajhi credit card while in the U.S. In one financial transfer from the account of two of the other hijackers, Marwan al-Shehhi and Mohamed Atta, \$200.00 was transferred into al-Omari's al-Rajhi Bank account via the Chase Manhattan Bank in New York, NY, to aid al-Omari's efforts in their planning of the attacks.
27. Al Rajhi Bank has many business interests which include extensive dealings with American corporations, or corporations which do extensive business in the United States.
28. The following organizations are Al Rajhi's U.S. investments: Aradi, Inc., and the Sulaiman Abdul Aziz al-Rajhi ("SAAR") Foundation. Sulaiman is also the Chairman and Managing Director of al-Rajhi Bank. Abdullah Sulaiman al-Rajhi, the General Manager of Al Rajhi Bank, is the President of Aradi Inc. Both of these U.S. Investments are located at 555 Grove Street, Herndon, Virginia, United States.
29. Al Rajhi Bank also has a direct involvement – through a position on the board of directors – in the following organizations:

Piedmont Poultry Processing, Inc.,

Address 1:

555 Grove Street

Herndon, Virginia, United States 20170

Address 2:

Post Office Box 129

Lumber Bridge, North Carolina United States 28357

Techno-Chemicals International, Inc.

1635 North Ironwood

South Bend, Indiana, United States 46635

Incorporated by Khaled Abdullah al-Rajhi

InfoCom Corporation

630 International Parkway

Post Office Box 850415

Richardson, Texas, United States 75081

30. Many of the al-Rajhi businesses used InfoCom to host their websites. InfoCom, incorporated on March 16, 1992 and based in Richardson, Texas, hosts five hundred websites for Muslim organizations, many of which have ties to terrorism. Two of those

organizations are Benevolence International Foundation (BIF) and Global Relief Foundation (GRF), both of whom were declared Specially Designated Global Terrorists (SDGT) by the United States Treasury Department for their financial support to al-Qaeda. These two charities laundered money and defrauded investors in order to fund bin Laden and al-Qaeda. WAMY, under US investigation for its ties to al-Qaeda, also has its website registered care of InfoCom.

31. SDGT Holy Land Foundation for Relief and Development (HLF) shares employees with and has offices right across the street from InfoCom. The FBI had InfoCom's assets frozen by the Treasury Department six days before the World Trade Center and Pentagon attacks and the plane crash in Pennsylvania. Like the HLF, InfoCom received much of its early money from Mousa Abu Marzook, a top Hamas official who, the U.S. courts have determined, was directly involved in terrorism.
32. InfoCom began hosting the website for al-Rajhi Banking and Investment Corporation in 1997. InfoCom also used al-Rajhi Banking and Investment to receive money from their numerous Saudi investors. InfoCom received considerable money from an al-Rajhi Bank located in Saudi Arabia, and it was reasonable to assume that the money was used in furtherance of InfoCom's trade activity. SDGT Mousa Abu Marzook and one of his agents made 11 wire transfers totaling \$2,003,659.00 into an unknown al-Rajhi Bank account from January 1989 through September 1992. InfoCom [and ICC, InfoCom's precursor] bank records show 48 wire transfers, totaling \$1,542,804.00, from an unknown al-Rajhi Bank account between January 31, 1991 and July 2, 1997.
33. The al-Rajhi family is the SAAR Foundation's biggest donor. The SAAR Foundation is the hub of an enormous U.S. business enterprise. The Foundation dissolved in December 2000, but the hundreds of organizations that it created continue on as its legacy.
34. The al-Rajhi funded SAAR Foundation spawned a complex network of organizations that share officers, addresses, and funding. As of 2003, the Virginia Secretary of State Corporate Records indicate that there are more than one hundred affiliated organizations registered or doing business at just one of SAAR's addresses at the 555 Grove Street location. Through this business enterprise, the al-Rajhi family maintains a strong presence with hundreds of U.S. businesses.
35. In addition to collecting donations on behalf of so-called "charities," Al Rajhi Bank has made numerous donations directly to charities headquartered or with offices in the United States. Al Rajhi Bank also conducts business in the United States through several corporate holdings.
36. Al Rajhi Bank and others, "purposefully directed" activities at the United States by funding those whose "activities" included killing innocent people for no reason other than that they were Americans.

37. Given al Qaeda's explicit direction of terrorist activities at the United States, [it can hardly be said that] Al Rajhi Bank had [no] warning that they might be answerable in United States court for their conduct in supporting these acts.
38. Al Rajhi Bank was a knowing participant in the September 11 attacks by way of their role in the lending of material support to al Qaeda and in their participation in a conspiracy to accomplish the same.